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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
EUGENE DIVISION

NICHOLAS JAMES MCGUFFIN, as an ) Civil No.  
individual and as guardian ad ) 6:20-cv-01163-  
litem, on behalf ) MK  
Of S.M., a minor, )  
Plaintiffs, )  
vs. )  
MARK DANNELS, PAT DOWNING, SUSAN )  
HORMANN, MARY KRINGS, KRIS )  
KARCHER, SHELLY MCINNES, RAYMOND )  
MCNEELY, KIP OSWALD, MICHAEL )  
REAVES, JOHN RIDDLE, SEAN )  
SANBORN, ERIC SCHWENNINGER, )  
RICHARD WALTER, CHRIS WEBLEY, )  
ANTHONY WETMORE, KATHY WILCOX, )  
CRAIG ZANNI, DAVID ZAVALA, ESTATE )  
OF DAVE HALL, VIDOCQ SOCIETY, )  
CITY OF COQUILLE, CITY OF COOS )  
BAY, and COOS COUNTY, )  
Defendants. )  
DEPOSITION OF MICHAEL REAVES  
Taken in behalf of Plaintiffs  
April 25, 2022  
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Also present: Nicholas McGuffin

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BE IT REMEMBERED THAT, pursuant to the Oregon  
Rules of Civil Procedure, the remote deposition of  
MICHAEL REAVES was taken by Amanda K. Fisher, Certified  
Shorthand Reporter, on April 25, 2022, in the City of  
Portland, County of Multnomah, State of Oregon.  
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Page 6	Page 8
<p>1 PORTLAND, OREGON; MONDAY, APRIL 25, 2022</p> <p>2 9:30 A.M.</p> <p>3 * * *</p> <p>4 MICHAEL REAVES</p> <p>5 called as a witness in behalf of Plaintiffs,</p> <p>6 having first been sworn by the Reporter,</p> <p>7 testifies as follows:</p> <p>8</p> <p>9 EXAMINATION</p> <p>10 BY MR. LAUERSDORF:</p> <p>11 Q. Mr. Reaves, will you please state your name as</p> <p>12 given at birth.</p> <p>13 A. Michael Wayne Reaves.</p> <p>14 Q. And what's your date of birth?</p> <p>15 A. November the 28th, 1951.</p> <p>16 Q. What's your current address?</p> <p>17 A. 668 Napoleon Avenue, Sunset, Louisiana.</p> <p>18 Q. Are you currently employed?</p> <p>19 A. Pardon me?</p> <p>20 Q. Are you currently employed?</p> <p>21 A. No.</p> <p>22 Q. Retired?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. What was your DPSST number?</p> <p>25 A. I don't know.</p>	<p>1 anyone else in the room with you?</p> <p>2 A. No, just Mr. Franz.</p> <p>3 Q. Okay. Mr. Franz has probably already explained</p> <p>4 to you, you're free to take a break to consult with him</p> <p>5 at any time.</p> <p>6 Do you understand that?</p> <p>7 A. Yes.</p> <p>8 Q. And, by the same token, you're free to take a</p> <p>9 break at any time for any reason, if you want to get up</p> <p>10 and stretch your legs, use the restroom, just let me</p> <p>11 know. The only thing I ask is that you answer whatever</p> <p>12 question might be pending before you get up and take a</p> <p>13 break. Okay?</p> <p>14 A. Yes, sir.</p> <p>15 Q. The court reporter is recording you answers</p> <p>16 under an oath administered a few moments ago.</p> <p>17 Do you understand that?</p> <p>18 A. Yes.</p> <p>19 Q. Do you understand what it means to be under</p> <p>20 oath?</p> <p>21 A. Yes.</p> <p>22 Q. Do you understand it means that you're expected</p> <p>23 to give the same careful and considered answers today</p> <p>24 that you would give in a court of law?</p> <p>25 A. Yes.</p>

2 (Pages 5 to 8)

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<p style="text-align: right;">Page 53</p> <p>1 Q. What's the -- during your time as Chief, and I 2 want to kind of switch over to the Freeman 3 investigation now, what were the criteria for 4 classifying an investigation as a homicide 5 investigation? 6 A. I don't understand what you're talking about 7 now. 8 Q. Well, at some point when it started, it was a 9 missing person investigation, right? And then at some 10 point it became a homicide investigation. So I'm just 11 wondering, what are the criteria? 12 A. All right. It went -- it was a missing person 13 investigation that went to an endangered missing 14 person. We treated it as a major case after a certain 15 period of time, and then it became a homicide 16 investigation when we found out there was a homicide. 17 Q. Okay. So when did you find out there was a 18 homicide? 19 A. When we found the deceased person. 20 Q. Okay. So is that the criteria for classifying 21 something as a homicide, once you have a body? 22 A. Well, if we knew -- if there was something prior 23 to that, if we had known there was an act that caused a 24 homicide before that, it would've been in homicide at 25 the time we knew of the act. But not having an act at</p>	<p style="text-align: right;">Page 55</p> <p>1 investigation? 2 Q. Yeah. 3 A. I would've been ultimately responsible for the 4 investigation up to a point, and then the District 5 Attorney would've taken over from that point. It was 6 kind of -- he kind of -- the District -- well, Paul 7 Frasier was kind of involved in this right from the 8 beginning, so he was also in a lead role in that. 9 Q. Okay. So at some point did he take over the 10 investigation? 11 A. Yes. 12 Q. And at what point was that? 13 A. It was after the -- after we were -- we had the 14 homicide -- homicide was verified. It wasn't like he 15 took over. I mean, he was -- he became the lead at 16 that point. 17 Q. Okay. So that would've been after the body was 18 found? 19 A. Yes. 20 Q. Okay. And so once he became the lead, what was 21 your role at that point? 22 A. My role? 23 Q. Yeah. 24 A. I was part of the team at that point. Well, 25 I -- actually, I left -- I left most of the work to</p>
<p style="text-align: right;">Page 54</p> <p>1 any time, you go by the evidence that you have at the 2 time. 3 Q. Okay. How many homicide investigations had you 4 been involved with prior to the Freeman investigation? 5 A. I don't remember. 6 Q. More than ten? 7 A. Probably. 8 Q. How many had you been the lead investigator on? 9 A. Probably one. I was not a homicide 10 investigator, but I was on homicide investigation teams 11 prior to this. 12 Q. Okay. What was your role in the Freeman 13 investigation? 14 A. What was my role in the Freeman investigation? 15 Q. Yeah. 16 A. I took the initial report. I worked 17 with -- with Dave Hall on the missing person part of 18 this thing. And then I facilitated the gathering of 19 the team together and participated in all the team 20 meetings and such on that. 21 Q. Okay. What was the chain of command for the 22 investigation, or was there a chain of command for the 23 investigation? 24 A. I don't -- I don't know what you mean by chain 25 of command. Who was ultimately responsible for the</p>	<p style="text-align: right;">Page 56</p> <p>1 Dave Hall and the major cases team. I went back to my 2 normal duties, and then I just kept familiar with the 3 case all the way through in there. 4 Q. Okay. So was there a -- so the case comes 5 in -- I want to try and understand this. So the case 6 comes in, and it comes into Coquille PD, right? And 7 you take the original missing persons report? 8 A. Right. 9 Q. And then at some point it escalates. Did you 10 appoint a case officer to the case? 11 A. That would've been Dave Hall. 12 Q. That was Dave Hall. Okay. 13 When did you appoint Dave Hall as the case 14 officer? 15 A. The day that it came in. 16 Q. Oh, okay. What are the responsibilities of the 17 case officer? 18 A. He would've been responsible for investigating 19 the case. 20 Q. Okay. And then does he report to you, or does 21 he -- what kind of authority does he have? Does he 22 just -- you appoint him and he gets to go off and do 23 whatever he wants, or what happens? 24 A. I don't understand what you're -- what you want 25 on this. He was the case officer. I worked with him</p>

14 (Pages 53 to 56)

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<p style="text-align: right;">Page 57</p> <p>1 on the case. Okay?</p> <p>2 Q. Okay.</p> <p>3 A. As the case escalated, he was the lead. He was</p> <p>4 the one who collated all the information that came in</p> <p>5 on the case. And our -- the -- the team -- the</p> <p>6 management team that we put together after the first</p> <p>7 three or four days, we worked together on deciding how</p> <p>8 the case was going to be investigated. But he was the</p> <p>9 lead officer, and he helped make the assignments on the</p> <p>10 investigation, and he worked with myself, he worked</p> <p>11 with Paul Frasier, he worked with the guys from OSP who</p> <p>12 came in with us, and everybody else.</p> <p>13 Q. Okay. So I think the reason I'm a little bit</p> <p>14 confused, and I just want to clarify, is in one of the</p> <p>15 other depositions, this was explained to me, and my</p> <p>16 understanding was that there's a case officer assigned</p> <p>17 at the agency where the case comes in, and then that</p> <p>18 case officer is responsible for that case regardless --</p> <p>19 A. Yes.</p> <p>20 Q. -- of how many other agencies are brought in.</p> <p>21 So, in other words, if somebody from Coos County</p> <p>22 Sheriff's office, if I asked them the question, why</p> <p>23 didn't you do this, his response was, well, the case</p> <p>24 officer didn't ask me to. It's the case officer who is</p> <p>25 running the case. Is that --</p>	<p style="text-align: right;">Page 59</p> <p>1 and we didn't have that many other -- Coquille Police</p> <p>2 Department had eight people, me and seven other people.</p> <p>3 He was as experienced as the other three people who</p> <p>4 were the most experienced in our department. He had</p> <p>5 just as much time in and just as much investigative</p> <p>6 experience as they had. So there wasn't anybody who</p> <p>7 had more experience than him at that point.</p> <p>8 Q. Just as much time as Lieutenant King?</p> <p>9 A. No. He -- he didn't have as much time as</p> <p>10 Lieutenant King, no. But I wasn't talking about</p> <p>11 Lieutenant King. I was talking about the other people</p> <p>12 who would've been involved in that.</p> <p>13 Q. Okay.</p> <p>14 A. Are you asking me if I should've put Lieutenant</p> <p>15 King in charge of the case?</p> <p>16 Q. I guess I'm asking if you considered that, and</p> <p>17 if you did, why --</p> <p>18 A. I didn't consider it at the time, no.</p> <p>19 Q. Okay. Why not?</p> <p>20 A. Why didn't I consider it at the time?</p> <p>21 Q. Yeah.</p> <p>22 A. Because we were working the case, and I was</p> <p>23 working with Dave.</p> <p>24 Q. Okay. What about Shelly Grant, what was her</p> <p>25 role?</p>
<p style="text-align: right;">Page 58</p> <p>1 A. I gotcha. I see where you're coming from.</p> <p>2 Dave was the case officer, but we worked</p> <p>3 together on getting all of this stuff done.</p> <p>4 Q. Okay. Why did you elect Dave Hall as a case</p> <p>5 officer?</p> <p>6 A. Because he was on duty at the time the missing</p> <p>7 person case came in.</p> <p>8 Q. Had he ever been involved in a homicide</p> <p>9 investigation at that point in his career?</p> <p>10 A. Dave?</p> <p>11 Q. Yeah.</p> <p>12 A. I believe he had, yes.</p> <p>13 Q. Do you recall one specifically?</p> <p>14 A. No. We didn't have a lot of homicide in</p> <p>15 Coquille.</p> <p>16 Q. Okay.</p> <p>17 A. I can't recall specifically. I think he had,</p> <p>18 but I don't remember.</p> <p>19 Q. So if he was assigned as the case officer when</p> <p>20 it originally came in as a missing person, did you at</p> <p>21 any time consider replacing him with somebody more</p> <p>22 experienced as a case officer?</p> <p>23 A. No. By the time that happened, we had a lot of</p> <p>24 experienced people involved with it, and we just left</p> <p>25 him as the -- he was the lead officer at that point,</p>	<p style="text-align: right;">Page 60</p> <p>1 A. Shelly Grant had just -- she was our -- she was</p> <p>2 our -- she was a dispatcher, and she had just become a</p> <p>3 police officer, and she had all of her certifications</p> <p>4 as a dispatcher, and we needed someone to take notes,</p> <p>5 and we needed someone to run our LEDS/NCIC computer</p> <p>6 stuff. We didn't want to put -- we were working very</p> <p>7 long hours, and our dispatch center for the Coquille</p> <p>8 Police Department is only open for eight hours, and we</p> <p>9 didn't want to put any of that burden on -- on the duty</p> <p>10 dispatcher, or the 911 center, since we had someone who</p> <p>11 was available to do those LEDS things, and NCIC things.</p> <p>12 You know, run names for us and track down phone numbers</p> <p>13 and investigation stuff. So she was essentially our</p> <p>14 case secretary and computer person.</p> <p>15 Q. Okay. So she didn't have any responsibility for</p> <p>16 witness interviews or actual out in-the-field</p> <p>17 investigation?</p> <p>18 A. No. No, she went with a couple of the officers</p> <p>19 when they went to interview females, but she had</p> <p>20 no -- she was not assigned any interview stuff on her</p> <p>21 own, no.</p> <p>22 Q. Okay. What were the duties of the CPD case</p> <p>23 officer? Like, was the case officer required to review</p> <p>24 all of the reports that were generated in the</p> <p>25 investigation?</p>

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<p style="text-align: right;">Page 69</p> <p>1 working with the MCIT?</p> <p>2 A. Not that I recall.</p> <p>3 Q. Okay. So when did you first become aware of</p> <p>4 Ms. Freeman's disappearance?</p> <p>5 A. The day her mother came in.</p> <p>6 Q. And that was June 29th, 2000, does that sound</p> <p>7 right?</p> <p>8 A. That sounds right.</p> <p>9 Q. Okay. Did you know anyone from the Freeman or</p> <p>10 McGuffin families prior to Ms. Freeman's disappearance?</p> <p>11 A. I don't think so. It's a small town, so I may</p> <p>12 have run into them, but I didn't know socially or</p> <p>13 professionally at any point that I can recall.</p> <p>14 Q. Okay. How about by reputation?</p> <p>15 A. By reputation?</p> <p>16 Q. Yeah.</p> <p>17 A. Prior to this, no.</p> <p>18 Q. Okay. When Ms. Courtright came in to report Ms.</p> <p>19 Freeman missing, was there anybody with her?</p> <p>20 A. I don't remember.</p> <p>21 Q. Okay.</p> <p>22 A. I thought -- I thought a young lady came with</p> <p>23 her, but I don't remember. I don't whether she came in</p> <p>24 or she called afterwards --</p> <p>25 Q. Okay.</p>	<p style="text-align: right;">Page 71</p> <p>1 there were in the Freeman investigation?</p> <p>2 A. No, I don't recall any. I don't recall</p> <p>3 any -- anybody even naming any.</p> <p>4 Q. Was it more than one?</p> <p>5 A. I don't recall. There may have been. I don't</p> <p>6 know.</p> <p>7 Q. Okay.</p> <p>8 A. You gotta remember, this is 22 years later for</p> <p>9 me.</p> <p>10 Q. Yeah. Yeah, I get it.</p> <p>11 At some point did Mr. McGuffin become a suspect</p> <p>12 in the investigation?</p> <p>13 A. Not while I was -- not in our part of it, no.</p> <p>14 Q. Okay. So by the time you left the Coquille</p> <p>15 Police Department in 2008, there wasn't sufficient</p> <p>16 reasonable suspicion to name Mr. McGuffin as a suspect</p> <p>17 in the investigation, is that right?</p> <p>18 A. We had -- we had talked it over with Paul</p> <p>19 Frasier quite a few times, but I don't think that we</p> <p>20 ever did name him as a suspect. I know we didn't name</p> <p>21 him as a suspect.</p> <p>22 We had cold case investigators who came in who</p> <p>23 said that we should be looking at him, but...</p> <p>24 Q. When was that?</p> <p>25 A. When Sean Sullivan was Sergeant, we brought in a</p>
<p style="text-align: right;">Page 70</p> <p>1 A. -- with information. But I don't recall.</p> <p>2 Q. When did Mr. McGuffin become a person of</p> <p>3 interest in the investigation?</p> <p>4 A. I -- I don't know. One of the -- one of the</p> <p>5 things we discussed early on was that Paul Frasier and</p> <p>6 the -- a lot of the people -- some of the people on the</p> <p>7 Major Case Team and FBI felt we didn't have enough</p> <p>8 information to either name him a person of interest or</p> <p>9 a suspect in the thing, so we didn't.</p> <p>10 I think that -- that later on in the</p> <p>11 investigation, that McGuffin was named a person of</p> <p>12 interest, but I don't remember exactly when it was. It</p> <p>13 was -- it wasn't right away. It was later on.</p> <p>14 Q. What is -- it seems like person of interest and</p> <p>15 suspect are terms of art to some extent.</p> <p>16 What does person of interest mean?</p> <p>17 A. A person of interest would be, you don't know</p> <p>18 what this person's involvement is, but the person was</p> <p>19 there. I mean, it could've been -- anybody that she</p> <p>20 saw that night could've been a person of interest.</p> <p>21 The difference between a person of interest and</p> <p>22 a suspect is that a suspect you have -- you have</p> <p>23 reasonable suspicion that this person might've been</p> <p>24 involved with whatever occurred.</p> <p>25 Q. So do you recall how many persons of interest</p>	<p style="text-align: right;">Page 72</p> <p>1 cold case investigator who went through the case. I</p> <p>2 don't know if we did another one after that or not.</p> <p>3 Q. Who was the cold case --</p> <p>4 A. I don't remember doing another one after that.</p> <p>5 Q. Who was -- I'm sorry to interrupt.</p> <p>6 A. I don't remember -- I don't remember the names</p> <p>7 of those cold case investigators either.</p> <p>8 Q. Okay. When did Sean Sullivan come in?</p> <p>9 A. After King retired and left the area, he came in</p> <p>10 as the Sergeant.</p> <p>11 Q. So sometime after 2002, you think?</p> <p>12 A. It was probably -- yeah, it was -- it was 2003,</p> <p>13 2004, somewhere in there. It might've been 2004. I</p> <p>14 don't remember.</p> <p>15 Q. Okay. And then you used the term "reasonable</p> <p>16 suspicion" there. Is that -- that seems like another</p> <p>17 term of art.</p> <p>18 A. Term of art, yeah. Less than probable cause.</p> <p>19 Q. Less than probable cause, but more than nothing,</p> <p>20 is that fair?</p> <p>21 A. More than what?</p> <p>22 Q. Less than probable cause, but more than no</p> <p>23 thought at all?</p> <p>24 A. Right.</p> <p>25 Q. Okay.</p>

18 (Pages 69 to 72)


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1 CERTIFICATE  
2 STATE OF OREGON )  
3 ) ss.  
4 COUNTY OF MULTNOMAH )  
5

6 I, Amanda K. Fisher, a Certified Shorthand  
7 Reporter, do hereby certify that, pursuant to  
8 stipulation of counsel for the respective parties  
9 hereinbefore set forth, MICHAEL REAVES remotely  
10 appeared before me at the time and place set forth in  
11 the caption hereof; that at said time and place I  
12 reported in Stenotype all testimony adduced and other  
13 oral proceedings had in the foregoing matter; that  
14 thereafter my notes were reduced to typewriting under  
15 my direction; and that the foregoing transcript, pages  
16 1 to 208, both inclusive, constitutes a full, true and  
17 accurate record of all such testimony adduced and oral  
18 proceedings had, and of the whole thereof.

19 Witness my hand and stamp at Portland, Oregon,  
20 May 03, 2022.  
21  
22

23   
AMANDA K. FISHER  
24 CSR No. 3229  
25



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